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Attorney for Plaintiff  
HERMINIA LORENZO CRUZ

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

HERMINIA LORENZO CRUZ,

Plaintiff,

v.

INTERNATIONAL COLLECTION  
CORPORATION, a California corporation,  
and CHARLES D. HENDRICKSON,  
individually and in his official capacity,

Defendants.

Case No. C08-00991-JF-RS

**PLAINTIFF'S NOTICE OF TAKING  
DEPOSITION OF DEFENDANT  
INTERNATIONAL COLLECTION  
CORPORATION'S DESIGNATED  
REPRESENTATIVE(S) PURSUANT  
TO FED. R. CIV. P. 30(b)(6) BY  
STENOGRAPHER AND/OR  
VIDEOTAPE, DUCES TECUM**

TO: Larry Rothman  
Larry Rothman & Associates  
1 City Boulevard West, Suite 850  
Orange, CA 92868  
Telephone: (714) 363-0220  
Facsimile: (714) 363-0229

**PLEASE TAKE NOTICE** that, pursuant to Fed. R. Civ. P. 30(b)(6), commencing on **September 9, 2008, at 2:00 p.m.**, and thereafter by adjournment until the same shall be completed, at the offices of Consumer Law Center, Inc., 12 South First Street, Suite 1014, San Jose, California 95113, OR such other location as may be later designated by Amended Notice, Plaintiff through her counsel will take the deposition(s) under oath of the designated representative(s) of Defendant, INTERNATIONAL COLLECTION CORPORATION (hereinafter, "ICC"), before a qualified

1 notary public under Fed. R. Civ. P. 28, stenographically and/or by videotape.

2 **PLEASE TAKE FURTHER NOTICE** that, the designated representative(s) of Defendant  
3 must be prepared to testify regarding “matters known or reasonable available to” Defendant,  
4 including but not limited to the following topics:

- 5 1. The factual basis for ICC’s Answer;
- 6 2. Any and all other information related to ICC’s defenses contained in its Answer;
- 7 3. The collection methods, practices, techniques and strategies used by ICC in its  
8 efforts to collect debts from consumers during the months October, 2006 through  
9 February, 2007;
- 10 4. All account notes, collection logs, miscellaneous notes, debtor work cards, or other  
11 documentation methods, if any, whether computerized, manual or other, of all  
12 activities undertaken by ICC or its employees related to Plaintiff;
- 13 5. Creation, modification, programming and use of any computer software and  
14 hardware used by ICC to receive, compile and/or maintain information on Plaintiff  
15 or Plaintiff’s account;
- 16 6. The methods, practices, techniques and strategies used by ICC in training its  
17 collection employees concerning compliance with the Fair Debt Collection Practices  
18 Act;
- 19 7. Any bona fide error defense ICC may have with regard to the allegations set forth in  
20 the Complaint filed by Plaintiff in this case;
- 21 8. Any bona fide error defense claimed by ICC in any case brought under the Fair Debt  
22 Collection Practices Act from January 1, 2005, to the present;
- 23 9. The names, titles, addresses and phone numbers of all persons who participated in  
24 designing, creating, furnishing, compiling or printing any and all of the collection  
25 letters and notices sent to Plaintiff by ICC in an effort to collect on any account;
- 26 10. The use of letters in the form of Exhibits 1, 4, 5, 6, 7, 8, 11 and 12 attached to  
27 Plaintiff’s Complaint;
- 28 11. The manner of mailing letters in the form of Exhibits 1, 4, 5, 6, 7, 8, 11 and 12

1 attached to Plaintiff's Complaint;

2 12. Defendant's discovery responses in this case;

3 13. All documents requested by Plaintiff in the course of this case;

4 14. The documents produced for inspection, review and copying noted below;

5 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Fed. R. Civ. P. 30(b) and 34,  
6 Defendant is required to produce at the aforementioned time and place the following documents for  
7 inspection, review and photocopying;

8 1. All documents in ICC's possession sent to or received from Harrah's Casino which  
9 in any way relate to the debt owed by Plaintiff.

10 2. All operation manuals or similar documents, etc., utilized by ICC relating to  
11 compliance with the Fair Debt Collection Practices Act.

12 3. All documents relating to the maintenance of procedures by ICC adapted to avoid  
13 any violation of the Fair Debt Collection Practices Act.

14 4. All litigation filed against ICC, in the past 3 years alleging violations of the Fair Debt  
15 Collection Practices Act, including 15 U.S.C. § 1692c(c).

16 5. All litigation filed against ICC, in the past 3 years alleging violations of the Fair Debt  
17 Collection Practices Act, including 15 U.S.C. § 1692e(2).

18 6. All litigation filed against ICC, in the past 3 years alleging violations of the Fair Debt  
19 Collection Practices Act, including 15 U.S.C. § 1692e(5).

20 7. All litigation filed against ICC, in the past 3 years alleging violations of the Fair Debt  
21 Collection Practices Act, including 15 U.S.C. § 1692e(8).

22 8. All litigation filed against ICC, in the past 3 years alleging violations of the Fair Debt  
23 Collection Practices Act, including 15 U.S.C. § 1692f(1).

24 9. All documents relating to the creation, modification, programming and use of any  
25 computer software and hardware used by ICC to receive, compile and/or maintain  
26 information on the Plaintiff's account.

27 10. All documents or lists which would contain or explain all abbreviations and codes,  
28 letters, numerals, or symbols regularly used by ICC in its records or collection

activities.

CONSUMER LAW CENTER, INC.

Dated: August 20, 2008

By: /s/ Fred W. Schwinn  
Fred W. Schwinn, Esq.  
Attorney for Plaintiff  
HERMINIA LORENZO CRUZ

**CERTIFICATE OF SERVICE**

I, Fred W. Schwinn, hereby certify that on August 20, 2008, the forgoing document was sent  
by facsimile and U.S. Mail to:

Larry Rothman  
Larry Rothman & Associates  
1 City Boulevard West, Suite 850  
Orange, CA 92868  
Telephone: (714) 363-0220

Talty Court Reporters, Inc.  
2131 The Alameda, Suite D  
San Jose, CA 95126  
Facsimile: (408) 244-1374

Dated: August 20, 2008

/s/ Fred S. Schwinn  
Fred W. Schwinn